

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ERIC WITHERSPOON
PETITIONER,

VS.

LOIS RUSSO,
SUPERINTENDENT, AND
M. JANE BRADY,
ATTORNEY GENERAL for the STATE
of DELAWARE,
RESPONDENTS.

Civ. Act. No. 04-1424-JJF



MOTION TO APPOINT COUNSEL

Now comes the Petitioner, Eric Witherspoon, request that this Honorable Court to appoint Counsel to assist him in the above matter. Reasons therefore:

1. Petitioner is a indigent prisoner thats currently being housed in a prison within the Commonwealth of Massachusetts.
2. Petitioner is without counsel or a person trained in law.
3. In the Respondents answer they make reference to certain State Court Rules that Petitioner cant oppose or challenge because Petitioner is without the rules of Court pertaining to the State of Delaware.
4. Petitioner is also without Delaware State Court Published opinions.

Respectfully Submitted
By the Petitioner



Eric Witherspoon, Pro Se
Souza Baranowski Corr Cntr.
Post Office Box 8000
Shirley, MA 01464

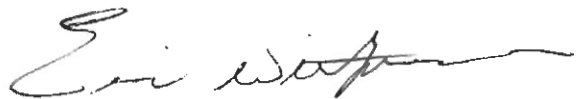
Dated: June 23, 2005

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY THAT ON JUNE 23, 2005 I FILED THE
ABOVE DOCUMENT (MOTION FOR THE APPOINTMENT OF COUNSEL)
WITH THE CLERK OF COURT BY REGULAR MAIL. I, ALSO
CERTIFY THAT ON THE SAME DAY I HAVE CAUSED THE SAME
TO BE FORWARDED TO THOMAS E. BROWN.

THOMAS E. BROWN
820 N. FRENCH STREET
WILMINGTON, DELAWARE 19801
JUNE 23, 2005

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Peter T. Dallo
Clerk's OFFICE
Delaware District Court
844 King Street, Lock Box
Wilmington, Delaware 19

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